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5 || Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KARL E. RISINGER, an individual, on behalf of himself and all others similarly situated,

Plaintiff,

VS.

SOC LLC, a Delaware limited liability company registered and doing business in Nevada as SOC NEVADA LLC; SOC-SMG, INC., a Nevada corporation; DAY & ZIMMERMANN, INC., a Maryland corporation; and DOES 1-20, inclusive,

Defendants.

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION TO EXTEND
DEADLINE FOR PHASE II
DISCOVERY**
(Second Request)

WHEREAS, on December 29, 2017, at the status hearing before the Court, the Court ordered a schedule for post-certification discovery, class notice, and pretrial deadlines (ECF No. 191);

WHEREAS, the parties have diligently sought to schedule all noticed depositions in a timely manner, but witness and counsel's availability has required certain rescheduling;

WHEREAS, the parties wish to extend the deadline to allow for the completion of the noticed depositions, particularly Plaintiff's 30(b)(6) deposition of SOC, LLC, and the deposition of the sole class representative, Karl Risinger, before serving expert witness disclosures; and

WHEREAS, this request for an extension on the discovery deadline will not prejudice the overall schedule as the Court has not yet set a trial date;

NOW THEREFORE, the parties hereby stipulate and agree to the following:

DISCOVERY SCHEDULE

1. Any expert witness disclosures on the issue of damages must be made no later than April 23, 2018.

2. Any rebuttal expert witness disclosures on the issue of damages must be made no later than May 23, 2018.

3. All expert witness depositions on the issue of damages must be completed no later than June 1, 2018.

TRIAL DEADLINES

4. Plaintiff shall submit its trial plan on or before June 15, 2018.

5. Plaintiff and Defendants will file a joint pretrial order on June 29, 2018.

Dated: April 4, 2018

EARLY SULLIVAN WRIGHT GIZER & McRAE
LLP

By: s/ Scott E. Gizer

SCOTT E. GIZER
DEVIN A. MCRAE
Attorneys for Plaintiff

1 Dated: April 4, 2018

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3 QUINN EMANUEL URQUHART & SULLIVAN
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5 By: /s/ Tara Lee

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7 KEITH H. FORST
8 DANIEL P. MACH
9 Attorneys for Defendants

10 In association with:

11 E. LEIF REID
12 KRISTEN L. MARTINI
13 Attorneys for Defendants

14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated this 6th day of April, 2018

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18 UNITED STATES MAGISTRATE JUDGE
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